

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

PENDLETON HEIGHTS GAY-STRAIGHT
ALLIANCE, an unincorporated association,

Plaintiff,

Case No: 1:21-cv-02480-JRS-TAB

v.

SOUTH MADISON COMMUNITY SCHOOL
CORPORATION; PRINCIPAL, PENDLETON
HEIGHTS HIGH SCHOOL, in her official
capacity,

Defendants.

AFFIDAVIT OF RILEY HERRIN

1. My name is Riley Herrin, I am at over eighteen (18) years of age, and I have personal knowledge of the facts stated herein.
2. I am an Essential Skills Teacher at Pendleton Heights High school.
3. As an Essential Skills Teacher, I provide services to students with intellectual and physical disabilities that allow their academic, social and functional skills to progress so they can be as independent as possible once leaving the program.
4. I am also the faculty sponsor for the Best Buddies club at Pendleton Heights High School.
5. I receive a stipend as the sponsor of Best Buddies because it is a corporation-sponsored club.

6. Our Best Buddies club is part of a national organization that is designed to foster one-to-one peer-mentoring and friendships between students with and without Intellectual and Developmental Disabilities.

7. The students without Intellectual and Developmental Disabilities are commonly referred to as general education students. The students with Intellectual and Developmental Disabilities are commonly referred to as essential skills students.

8. Our chapter provides leadership development and skill building for students with and without disabilities.

9. Our chapter engages in service-based learning experiences that allows students to learn and demonstrate employability skills that are required for graduation.

10. General education students are paired with Essential Skills students to provide peer-to-peer mentoring.

11. The students of Best Buddies work together to plan, organize, and implement five programs or events.

12. Those events include a Thanksgiving Dinner, a Respect Walk, a Pacer Game outing, a Friendship Walk with all of Indiana, and United Champions.

13. For the Thanksgiving dinner, the general education students in Best Buddies plan the menu, create the shopping list, organize the meal preparation, and prepare each dish with the essential skills students.

14. For the Pacers game outing, the general education students must work with the essential skills students to coordinate group attendance, set a schedule and plan for getting to and from the game, and execute that plan with the essential skills students.

15. For the Respect Walk and Friendship Walk, the students are responsible executing each detail of the event from creating and following a timeline for the walk, to communicating with the community and Best Buddies national headquarters about the event to selling concessions the day of the event.

16. Unified Champions event is part of the Special Olympics program and is designed to promote social inclusion through planned and implemented activities.

17. For Unified Champions, the general education students organize athletic events for the essential skills students, assist in getting the essential skills students to the correct location and event, assist the essential skills student to allow them to participate the activity, and time or score the activities.

18. The events organized by the students in Best Buddies allow students to demonstrate the following Indiana Employability Skills as identified in the Indiana Employability Skills Standards:

- a. Time Management / Organization, including planning and organizing long and short-term goals.
- b. Organizational skills while completing project-based learning experiences and activities.

- c. Ethical decision-making skills to establish and maintain responsible personal and professional relationships.
- d. Listening to others' ideas and respecting different ways of being and doing.
- e. Thinking critically about equity and social justice in a variety of environments and cultures.
- f. Showing care for people like them and people different from them
- g. Demonstrating a willingness to work and learn, and continually applying new knowledge.
- h. Demonstrating the ability to find alternate strategies to overcome barriers and mistakes when completing projects or activities.
- i. Showing responsibility by acting in a professional, culturally responsive, and ethical manner.
- j. Demonstrating the ability to network with others through social awareness and cultural sensitivity.
- k. Demonstrating a strong understanding of how other people might feel about an experience or situation.
- l. Collaborating to work well with others on a team.
- m. Recognizing the importance of diverse perspectives within communication and seeking understanding.
- n. Finding constructive solutions and working toward compromise.

19. The activities of Best Buddies are designed to directly incorporate the curriculum of Interpersonal Relations, Human Development and Wellness, and Essential Skills Cadet Teaching.

20. The following Interpersonal Relationships standards are required by the Indiana Department of Education and are directly related to the activities of Best Buddies:

IR-1.6 Demonstrate fundamentals to college and career success (e.g. strong work ethic, time management, positive attitude, adaptability/flexibility, stress resilience, accountability, self-discipline, resourcefulness, cooperation, self-assessment)

IR-1.7 Apply standards of ethical behavior when making judgments or taking personal actions

IR-2.3 Examine and contrast characteristics and consequences of healthy and unhealthy relationships in career, community, and family settings.

IR-3.4 Analyze impacts of personal standards and behaviors on relationships in career, community, and family settings

IR-3.5 Examine impacts of stress management on relationships in career, community, and family settings

IR-3.3 Consider effects of self-esteem and self-image on relationships in career, community, and family settings

IR-4.4 Analyze strategies to overcome communication barriers in career, community, and family settings

IR-4.6 Assess impacts of selection and use of communication technologies on relationships in career, community, and family settings.

IR-4.7 Choose appropriate communication methods and styles for business and social situations

IR-5.3 Implement strategies to increase tolerance of individual or group differences; prevent bullying, violence, and abuse; and encourage peaceful resolution of conflict in career, community, and family settings

IR-6.2 Create an environment that encourages and respects the ideas, perspectives, and contributions of all group members in career, community, and family settings

IR-6.4 Demonstrate ways to organize and delegate responsibilities in career, community, and family settings

21. The following Human Development and Wellness standards are required by the Indiana Department of Education and are directly related to the activities of Best Buddies:

HDW-1.3 Demonstrate leadership that encourages participation and respect for the ideas, perspectives, and contributions of group members

HDW-1.6 Demonstrate fundamentals to career success (e.g. strong work ethic, time management, positive attitude, adaptability/flexibility, stress resilience, accountability, self-discipline, resourcefulness, cooperation, self-assessment)

22. Additionally, the activities of Best Buddies are designed to include required Content Connectors for students with significant cognitive disabilities.

23. The Content Connectors are aligned to Indiana Academic Standards can create an alternate standard to ensure all students have access to grade level aligned content and to achieve educational accountability for students with learning disabilities.

24. The activities of Best Buddies are designed to allow essential skills students to learn how to appropriately talk to others and interact with people their age in diverse environments (such as at a dinner or at a game).

25. Essential skills students are often more willing to learn from someone their own age.

26. Essential skills students are often in a self-contained classroom and do not get to engage with general education students in a meaningful way during the school day.

27. Having the opportunity for essential skills Students to engage with general education students their age during the Best Buddies meetings and events allows for more one on one interaction to provide essential skills students with the opportunity for content connectors.

28. The Essential Skills Cadet Teaching class is designed for high school students who are interested in working with students with disabilities.

29. The Cadet Teaching class is a hands-on class where peer tutors work in small groups or one-on-one with the essential skills students.

30. The activities of Best Buddies provide an extension of the Cadets Teaching Class by allowing for more one-on-one peer mentoring.

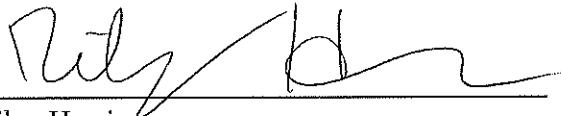
31. During Best Buddies events, general education students teach speaking skills to the essential skills students by modeling appropriate communication and speaking skills.

32. A key standard in the curriculum for the Cadet Teaching class is, "You are meant to be strong role models to the essential skills students." Best Buddies events implement that same key standard.

33. The activities performed by the students in Best Buddies satisfy the graduation requirement for Employability Skills.

34. If a student meaningfully engages and participates in planning and implementation of the activities of Best Buddies, I can sign-off on that students record indicating he or she has satisfied his or her Employability Skills requirement for graduation.

Date: 12/08/2021


Riley Herrin